

US Bureau of Reclamation
CALFED Admin Draft Comments
Foundational Issues

- A. Tone** [for example - see Table 3.1-1= pg 4 (vegetation); pg7 (flood measures)]
- * Seems to "hard-sell" Alternative 3
 - * Unbalanced articulation of potential significant impacts

Recommendation: Revise document to be written in unbiased tone, with sensitivity to varying perspectives on issues, and stating facts with no judgements.

- B. Report Organization**
- * Components of program description (what there is) in appendices - not main body
 - * Common program actions are only generally described and assessed in main document - stated "independence of common programs"; "integration"; some elements not common
 - * Repeated reference to Phase II report - we have not seen this document, therefore, it is difficult to have comfort with what is in the Admin draft
 - * Upper Watershed Resource Area is not discussed as other resource areas are

Recommendation: Revise document to include program specifics in the main body of the text and allow for assurances, once finalized, to also be included in the main body of the report. Phase II report and Technical Appendices must be shared prior to release of draft document. There needs to be adequate time allowed for staff review and modifications to address "serious" concerns of Phase II report and Technical Appendices. The draft document should include a discussion on Upper Watershed resources as done for other resource areas.

- C. Report Content**
- * Report written as if program and details are determined
 - * No articulation of uncertainties

Recommendation: Present the current status of program development and the proposed approach to determine definition, details, and complete analysis in the time between draft and final documentation.

- D. Program Approach**
- * Resources approach - "how much water can be moved from north to south in each conveyance alternative while maintaining the ecological integrity of the Bay-Delta?"
 - * Water supply approach - "what's the demand for human uses and how to get the water where it's needed for human uses ? - the rest goes to the environment"

Recommendation: Revise document to acknowledge these different approaches, how they are used in the current analysis, and the need to work to merge these together in the final program.

- E. Need for "defensible" analysis**
- * Current analysis is necessarily subjective and therefore open to legitimate criticism, if not qualified
 - * Current results are skewed by selection of parameters (unanticipated result of "distinguishing characteristics" approach)

Recommendation: Revise document to acknowledge the lack of inclusion of (known and unknown) parameters of concern. The draft document should also identify a process to use the time between draft and final to determine all parameters of concern, and a strategy to conduct an unbiased analysis of identified parameters that results in a "defensible" analysis (one that addresses issues and concerns from all perspectives).